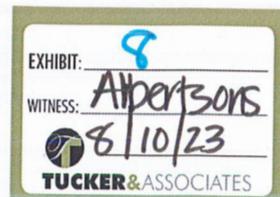


# EXHIBIT

15

Date: Thursday, August 29 2019 08:32 AM  
Subject: RE: opioids  
From: Jessica Covaci  
To: Raed Alzahrani <Raed.Alzahrani@albertsons.com>;  
CC: Stephen Certo <Stephen.Certo@albertsons.com>;  
Attachments: image001.png



Hi Raed – No worries at all. When things come in writing, I have to give a written response. This one's becoming more of a canned response when we have pharmacy team members that send in emails like the one you received. As for wording to use, I think the highlighted section addresses what you're looking for – the key here to make sure they understand is they need the supporting documentation.

We support a pharmacist's professional judgment with appropriate documentation regarding red flag identification and subsequent actions taken to support the decision to/not to dispense.

I'm tied up most of today in meetings, but if you want me to call you, let me know.

Thanks,

Jess

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**From:** Raed Alzahrani <Raed.Alzahrani@albertsons.com>  
**Sent:** Wednesday, August 28, 2019 5:17 PM  
**To:** Jessica Covaci <Jessica.Covaci@albertsons.com>  
**Cc:** Stephen Certo <Stephen.Certo@albertsons.com>  
**Subject:** Re: opioids

Thank you Jessica for your response. I apologize I don't think I articulated myself correctly in my previous email, my question is how would you suggest I word it to any pharmacist that asks, for example would it be appropriate to say use your judgment and the company won't retaliate against you, but my concern is the word retaliate too harsh. I would like your opinion on the wording. should I say use your judgment and that's it. I just wanted to bounce the idea off of you on how I should word it. As always I appreciate your guidance.

Raed.

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**From:** Jessica Covaci <Jessica.Covaci@albertsons.com>  
**Sent:** Wednesday, August 28, 2019 3:23:42 PM  
**To:** Raed Alzahrani <Raed.Alzahrani@albertsons.com>  
**Cc:** Stephen Certo <Stephen.Certo@albertsons.com>  
**Subject:** RE: opioids

Hi Raed –

Appreciate the questions by the pharmacist, but am concerned that he is unaware of all the policies, communications, and trainings that have been issued regarding appropriate dispensing. So, I would ask that you please work to make sure he fully understands all of the information that has been provided.

Albertsons Companies is very aware of the attention given to the current opioid crisis and our obligations as a responsible corporate citizen, healthcare provider, and employer. Consequently, we are continuously reviewing measures taken in response to the opioid crisis and to otherwise address the appropriate dispensing of all controlled substances. We believe that the policies and guidance issued and efforts taken align with federal and state laws to prevent inappropriate dispensing

while still providing appropriate care to legitimate patients that need medications. The law assigns pharmacists (not companies) a corresponding responsibility to ensure appropriate dispensing of controlled substances. They are the healthcare professional who is best positioned within our company to assess each situation and each patient and to appropriately collaborate with prescribers to make professional judgment determinations. We believe that adoption of strict policies that displace, interfere with, or restrict a pharmacist's ability to use his/her professional skills and to exercise professional judgment goes against the intent of the law. We support a pharmacist's professional judgment with appropriate documentation regarding red flag identification and subsequent actions taken to support the decision to/not to dispense.

Certain competitors have taken stances in an effort to minimize company risk that are outside of what is required by law and, as the pharmacist below identifies, cause legitimate pain patients to seek healthcare elsewhere. This influx of new patients should not deter pharmacists from appropriately evaluating each situation, taking the steps necessary to resolve any red flags, and documenting actions supporting a professional judgment decision. Payers are also setting restrictions, and we have no control over those other than to ensure we are complying with proper billing and documentation. Contrary to what is asserted, while we accept discount cards (as do our competitors), we do not use them as an advertising mechanism to attract new customers nor are we permitted to collaborate with competitors on pricing decisions. The availability of providing access to prescription drugs for those without healthcare coverage is legitimately needed in some cases.

Let me know if you need help with locating any of the policy or training resources we've made available to our pharmacists to help them address these challenging issues.

Thanks,

Jess

**Jessica Covaci**  
Director, Pharmacy Compliance



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[jessica.covaci@albertsons.com](mailto:jessica.covaci@albertsons.com)

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**From:** Raed Alzahrani <[Raed.Alzahrani@albertsons.com](mailto:Raed.Alzahrani@albertsons.com)>  
**Sent:** Wednesday, August 28, 2019 9:53 AM  
**To:** Jessica Covaci <[Jessica.Covaci@albertsons.com](mailto:Jessica.Covaci@albertsons.com)>  
**Cc:** Stephen Certo <[Stephen.Certo@albertsons.com](mailto:Stephen.Certo@albertsons.com)>; Raed Alzahrani <[Raed.Alzahrani@albertsons.com](mailto:Raed.Alzahrani@albertsons.com)>  
**Subject:** Fwd: opioids

Hi Jessica  
This is a concern from one of my pharmacist regarding opioids dispensing specially all other company are switching to 7 days supply. I appreciate if you can advise me if the company is looking into it.  
Thank you so much for your time Jessica.

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**From:** Store 4404 c01 - Pharmacy General <[S4404C01@safeway.com](mailto:S4404C01@safeway.com)>  
**Sent:** Tuesday, August 27, 2019 9:07:33 PM  
**To:** Raed Alzahrani <[Raed.Alzahrani@albertsons.com](mailto:Raed.Alzahrani@albertsons.com)>  
**Subject:** opioids

Raed

This week we are having patients come directly from the Wal-Mart pharmacy to our counter with their prescriptions after being told by the Wal-Mart that "they follow the government guidelines when filling opioid prescriptions".

The inference is that we at Safeway do not and therefore will fill those prescriptions.

I have pointed out to you that we have had an increasing number of C2 rx's being presented to us by current and former Wal-Mart customers who find themselves unable to get pain meds for post op pain and for higher doses in the months since Wal-Mart announced their change in policy.

New, or naïve patients are being held to a specific morphine equivalent and days supply or being sent away to see those drugs elsewhere by the Wal-Mart.

Personally, I think that they are being disingenuous in turning people away. I feel that pain treatment is important to post op patients.

Some common sense and middle ground should probably prevail.

In addition, our local OHP managed care plan has set limits on dosage and duration of opioids, no longer paying for chronic pain care meds and also not paying beyond those high dose limits.

This puts quite a number of county benefit recipients looking for narcotics based on price.

I have also pointed out to you that our company's relationship with GoodRx seems to makes us the low price leader on the common c2 rxs in our market.

What is happening right now is people are coming to us for opioids and expecting less scrutiny and expecting to pay less money.

They come with printed GoodRx billing info showing our price to be less than the competition.

Please take the time to look up prices for narcotics on GoodRx.

I believe that it is neither wise or ethical to be advertising low prices on narcotics.

I also believe that Safeway will be on the wrong side of history if it contributes more than it's share to the ongoing opioid crisis.

While Wal-Mart's policy may be an over reaction to the current climate, they have at least articulated a policy which they are following here in Dallas Oregon.

With state governments looking for reimbursement for the cost of the opioid crisis it may be prudent for Safeway to evaluate it's position in the narcotic market.

Please pass this on to whoever above you that might be in a position to affect policy.

Thank You

Dave Zandberg  
Staff Rph 4404

<https://money.cnn.com/2018/05/07/news/companies/walmart-opioid-policy/index.html>

[https://www.cdc.gov/drugoverdose/pdf/Guidelines\\_Factsheet\\_a.pdf](https://www.cdc.gov/drugoverdose/pdf/Guidelines_Factsheet_a.pdf)